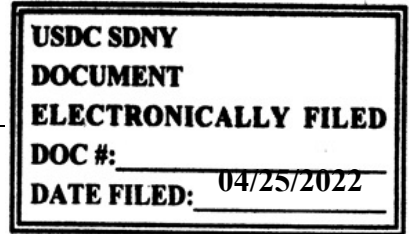


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April 25, 2022



MEMO ENDORSED

United States Magistrate Judge Katharine H. Parker
United States District Court for the
Southern District of New York
500 Pearl Street, Courtroom 17D
New York, New York 10007

Re: Hall & Price v. Protoons Inc., 1:21-cv-02043-AT-KHP (S.D.N.Y.)

Dear Judge Parker:

We represent Defendant Protoons Inc. in the above-referenced action. The Court has scheduled a Settlement Conference to take place before Your Honor on May 3, 2022. ECF 59. Your Honor adjourned the Settlement Conference once before, to allow the parties additional time to engage in ongoing settlement discussions.

I am writing at this time, jointly on behalf of Defendant and the Plaintiffs, to request a further three-week adjournment of the date for the settlement conference. The reason for this adjournment, as with the prior adjournment, is to allow additional time to explore a potential global resolution of this matter with a third party, which efforts have further advanced in the last several weeks. The parties agree not to seek any further adjournments of the settlement conference.

I am simultaneously writing to District Judge Torres to request a further adjournment of the parties' deadline to file pre-motion letters in advance of dispositive motions, for the same reasons set forth herein.

Respectfully submitted,

Hillel I. Parness

cc: Counsel of Record

APPLICATION GRANTED: The telephonic settlement conference in this matter scheduled for Tuesday, May 3, 2022 at 2:00 p.m. is hereby rescheduled to Monday, July 18, 2022 at 2:00 p.m. Counsel for the parties are directed to call Judge Parker's court conference line at the scheduled time. Please dial (866) 434-5269, Access code: 4858267. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than July 11, 2022 by 5:00 p.m.

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J.

04/25/2022